

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

IN RE SWISHER HYGIENE, INC. SECURITIES AND DERIVATIVE LITIGATION	§ § § § §	MDL DOCKET NO.: 3:12-MD-2384-GCM
<hr/>		
ROBERT HARRIS,	§ § §	
Plaintiff,	§	MEMBER CASE DOCKET NO.:
v.	§	3:14-cv-2388
SWISHER HYGIENE, INC., et al.,	§ § §	
Defendants.	§	

**STIPULATION AND PROPOSED ORDER GOVERNING EACH
DEFENDANT'S TIME TO ANSWER, MOVE OR OTHERWISE RESPOND**

WHEREAS, on September 17, 2015, the Court approved a proposed stipulation and order pursuant to which Defendants did not have to answer, move or otherwise respond to Plaintiff's complaint until October 19, 2015.

WHEREAS, the September 17, 2015 Order provides that the parties reserved their rights to seek modifications of the Order or any other relief upon its expiration.

WHEREAS, the parties have reached an agreement to further extend Defendants' time to answer, move or otherwise respond to the complaint.

IT IS HEREBY STIPULATED AND AGREED, by and among the parties through the undersigned counsel, subject to the approval of the Court, that:

1. The Defendants do not need to answer, move or otherwise respond to the complaint until November 2, 2015.

2. The parties reserve their rights to seek a modification of this proposed order or any other relief upon expiration of this proposed order.

Respectfully submitted,

s/ Simon M. Lassel

Ejola Cook
Simon M. Lassel
THE TICKTIN LAW GROUP, P.A.
600 West Hillsboro Boulevard
Suite 220
Deerfield Beach, Florida 33441-1610
Tel: (954) 570-6757
ecook@LegalBrains.com
slassel@LegalBrains.com

Attorneys for Plaintiff

Respectfully submitted,

s/ Jonathan M. Watkins

James P. McLoughlin, Jr.
N.C. State Bar No. 13795
Valecia M. McDowell
N.C. State Bar No. 25341
Jonathan M. Watkins
N.C. State Bar No. 42417
MOORE & VAN ALLEN PLLC
Bank of America Corporate Center
100 North Tryon Street, Suite 4700
Charlotte, North Carolina 28202
Tel: (704) 331-1000
jimmcloughlin@mvalaw.com
valeciamcdowell@mvalaw.com
watkinsj@mvalaw.com

Paul J. Lockwood
Alyssa S. O'Connell
SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
One Rodney Square
920 King Street
Wilmington, Delaware 19801
Tel: (302) 651-3000
paul.lockwood@skadden.com
alyssa.oconnell@skadden.com

Dated: October 16, 2015

Attorneys for Defendant Swisher Hygiene, Inc.

SO ORDERED.

Signed: October 19, 2015



Graham C. Mullen
United States District Judge

